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RAILROAD COMMISSION OF TEXAS

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November 9, 1987

RS-PA -98-4868-42

Mr. Richard L. Beam  
**Director**  
Office of Pipeline Safety  
U.S. Department of Transportation  
Research and Special Programs Admin.  
400 Seventh Street, S.W.  
Washington, DC. 20590

DEPT. OF TRANSPORTATION  
DOCKETS  
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Dear Mr. Beam:

During the September 22, 1987, meeting of the Technical Pipeline Safety Standards Committee in Washington, D.C., proposals were made to clarify certain definitions.

The definitions **proposed** by the American Petroleum Institute (API) **are** outlined in the **enclosure** with this letter. The Texas Mid-Continent Oil and Gas Association and the Texas Independent Producers and Royalty Owners Association, two highly respected **organizations** within the oil and **gas** industry, have endorsed the proposed definitions.

The Texas Railroad Commission joins these two organizations and the API in urging the adoption of these proposed definitions for **"gathering line," "transmission line,"** and **"production facility?"** However, in consonance with the basic reason for the existence of the Department of **Transportation's** Office of Pipeline Safety - which is public safety - we urge the Safety Standards Committee and the DOT to consider an additional change.

In **determining** which pipelines are subject to pipeline safety enforcement, the DOT now relies upon the basic criteria of the type of pipeline facilities (definitions), and the proximity of those facilities to public living, working, or gathering areas.

We urge greater reliance on the second criterion - proximity to people - and less on definitions. If a pipeline passes through or near a working or living area, or other public gathering area, pipeline safety becomes an issue, regardless of how the pipeline is defined.

The **DOT** presently defines class locations for pipelines, under 49 CFR Part 192.5. A class **1** location is any class location unit that has 10 or less buildings intended for human occupancy,

within a certain distance of the pipeline. Class 2 and higher classes have **increasing** concentrations of people, buildings, etc.

Under Part 192.1, the minimum safety standards do not apply to onshore gathering lines **outside** of (i) cities, towns, or villages, or (ii) any designated area, with examples given.

We propose that Part 192.1 be **revised** as follows:

(b) This part does not apply to:

(no change)

(IL) Offshore **gathering** of gas upstream from the **outlet flange** of each facility on the outer continental shelf where hydrocarbons are produced or where **produced** hydrocarbons **are** first separated, dehydrated, or otherwise processed, whichever facility is **farther** downstream: and

(revised)

(2). Onshore gathering of gas for **any** portion of the pipeline facilities located outside of **the** populated **areas** referred to in (c) below.

(new)

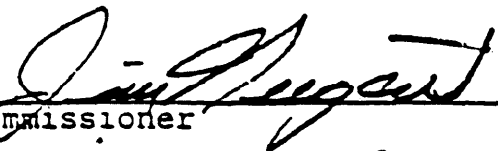
(c) The minimum safety standards -do apply to onshore **gathering** of gas for **any** portion of the gathering pipeline facilities located within:

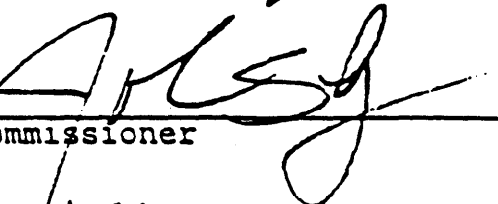
(i) A class 2 **or** higher location, as defined in Part 192.5.

(ii) Any other location specifically designated by the Office of Pipeline Safety.

Thank you for your consideration of this proposal.

Sincerely,

  
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Commissioner

  
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Commissioner

  
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Commissioner